

## REMARKS

Applicants submit this Request for Reconsideration in reply to the non-final Office Action mailed on September 6, 2005. Claims 1-52 are currently pending. Claims 1, 11, 24, 25, 38, 51, and 52 are independent claims.

On pages 2-9 of the Office Action, the Examiner rejects claims 1-2, 6-8, 10-15, 19-21, 23-29, 33-35, 37-43, 47-49, and 51-52 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,480,860 to Monday ("Monday"). On pages 10-11 of the Office Action, the Examiner rejects claims 3-5, 16-18, 30-32, and 44-46 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Monday, in view of U.S. Patent No. 6,732,360 to Seo ("Seo"). On pages 11-12 of the Office Action, the Examiner rejects claims 9, 22, 36, and 50 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Monday, in view of U.S. Patent No. 5,826,270 to Rutkowski ("Rutkowski"). Applicants appreciate the Examiner's thorough efforts in interpreting the cited references as they relate to the claim language. However, Applicants respectfully traverse these rejections.

### I. 35 U.S.C. § 102(e) Rejections

The Examiner rejects claims 1-2, 6-8, 10-15, 19-21, 23-29, 33-35, 37-43, 47-49, and 51-52, as being anticipated by Monday. Applicants respectfully traverse these rejections. Monday does not disclose or suggest the invention as set forth in each of independent claims 1, 11, 24, 25, 38, 51, and 52.

Monday discloses a system for using a markup language, such as XML, to allow a user to access information in a database. Requests for data are made from a markup language interface, such as an XML interface, and are then sent through a translator, or

bridge, which parses the requests and sends them to an appropriate source (i.e. database) that contains the requested data. The source then retrieves the data and sends it back to the translator, which constructs an XML document with the retrieved data and sends it back to the requesting client. See col. 7, lines 24-67.

Contrary to the Examiner's assertions, Monday fails to disclose all of the recited features of the claimed invention. For example, with regard to claim 1, the Examiner asserts that col. 5, lines 32-34, of Monday discloses that a requestor application sends "an information request including document information related to a requested information document," as claimed. See p. 2 of the Office Action. Applicants respectfully disagree. Col. 5, lines 32-34 states, "Markup language translator 126 is used to translate a *data request* made via markup language interface 124 into a query format for database 128" (emphasis added). Thus, Monday is not directed to a method for sending requests including *document information* from a requestor application. Monday only discloses a user interface that sends data requests. As such, Monday does not disclose requests, sent by a requestor application, that include document information related to a requested information document.

In addition, with regard to claim 1, the Examiner asserts that col. 7, lines 28-30, of Monday discloses "retrieving document retrieval information from a configuration database as a function of the document information," as claimed. See p. 2 of the Office Action. Notwithstanding the arguments above with respect to Monday's failure to disclose requests that include document information, Applicants respectfully disagree that Monday discloses retrieving document retrieval information from a configuration database. Col. 7, lines 28-30 of Monday states, "Next, the bridge parses the data

request and identifies the data source or sources that contain the requested data....”

Thus, Monday does not disclose the use of a configuration database from which to retrieve document retrieval information, as claimed. To be sure, the only database disclosed by Monday is a database holding requested data (see col. 7, lines 59-61; col. 5, lines 25-31). Thus, Monday does not disclose the use of a database in retrieving document retrieval information.

For these reasons, claim 1 is believed to be allowable over the disclosure of Monday. Independent claims 25 and 52, although of different scope from claim 1, also recite “an information request including document information related to a requested information document” and “retrieving document retrieval information from configuration database.” Thus for the same reasons stated with regard to claim 1, claims 25 and 52, are believed to be allowable as well.

Independent claims 11, 24, 38, and 51, although of different scope from claim 1, recite similar features that are also not disclosed by Monday. For example, claims 11, 24, 38, and 51 all recite retrieving “dimensions from a configuration database,” and further recite retrieving “a destination and a MCI command from the configuration database.” The Examiner cites col. 7, lines 50-58 and col. 5, lines 25-31 of Monday as disclosing these features. However, neither of these portions disclose or suggest a configuration database or retrieving dimensions, a destination, or an MCI command from the configuration database. Again, the only database described by Monday is the end database holding the desired requested data. Monday does not disclose or suggest a configuration database containing dimensions, destination, or MCI command

information, as recited in claims 11, 24, 38, and 51. For these reasons, claims 11, 24, 38, and 51 are believed to be allowable over the disclosure of Monday.

Dependent claims 2, 6-8, 10, 12-15, 19-21, 23, 26-29, 33-35, 37, 39-43, and 47-49 depend from at least one of claims 1, 11, 25, or 38, and are thus allowable at least for the same reasons. As such, Applicants respectfully request withdrawal of the Section 102(e) rejections based on Monday, and allowance of pending claims 1-2, 6-8, 10-15, 19-21, 23-29, 33-35, 37-43, 47-49, and 51-52.

## II. 35 U.S.C. § 103(a) Rejections

The Examiner rejects claims 3-5, 16-18, 30-32, and 44-46 as being unpatentable over Monday in view of Seo, and rejects claims 9, 22, 36, and 50 as being unpatentable over Monday in view of Rutkowski. However, as discussed above, Monday fails to disclose certain claim features present in the pending independent claims. Neither Seo, nor Rutkowski cure those deficiencies. Thus, Applicant respectfully traverses the Section 103(a) rejections, for at least the same reasons described above.

In view of the foregoing arguments, Applicants respectfully submit that claims 1-52 are neither anticipated nor rendered obvious in view of the references cited against this application. Applicants therefore request withdrawal of the Section 102(e) and Section 103(a) rejections, and allowance of pending claims 1-52.

The Office Action contains characterizations of the claims and the related art with which Applicants do not necessarily agree. Unless expressly noted otherwise, Applicants decline to subscribe to any statement or characterization in the Office Action.

If a telephone interview will expedite issuance of this application, the Examiner is requested to call Applicants' representative, whose name and registration number appear below, to discuss any remaining issues.

Please grant any extensions of time required to enter this Request for Reconsideration and charge any additional required fees to our Deposit Account No. 06-0916.

Respectfully submitted,

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